

EXHIBIT D



Lockridge Grindal Nauen PLLP

For more than 40 years, Lockridge Grindal Nauen PLLP has served clients throughout the Midwest and in Washington, D.C. Our attorneys and lobbyists have extensive experience in local, state, and federal government relations as well as antitrust, business, campaign finance, consumer, data breach, governmental, health care, employment, environmental, ERISA, intellectual property, real estate, securities, and tribal law and litigation.

Our firm represents clients of all shapes and sizes, taking the time to understand each client's goals and aspirations before tailoring our representation to meet their individual needs, whether they be in the courtroom, the halls of Congress, city hall, or in their state capitol.

Our clients include local and tribal governments, health care professionals and organizations, real estate developers, energy companies, telecommunications providers, casualty insurers, trade and industry associations, health and pension funds, unions, as well as issue-based coalitions.

Lockridge Grindal Nauen's attorneys and government relations professionals are assisted by an extensive support staff. The firm has offices in Minneapolis, MN, Chicago, IL and Boston, MA.

Cases

Lockridge Grindal Nauen serves or has served as Lead or Co-Lead counsel in these recent cybersecurity, privacy, and data breach cases:

- *In re: MOVEit Customer Data Security Breach Litigation*, No. 23-md-03082 (D. Mass)
- *In re: Capital One Consumer Data Security Breach Litig.*, No. 19-md-02915 (E.D. Va.)
- *In re: BPS Direct, LLC, and Cabela's LLC, Wiretapping*, No. 23-md-03074 (E.D. Pa.)
- *In re Arby's Restaurant Group, Inc. Data Security Litig.*, No. 17-00514 (N.D. Ga.)
- *In re: Community Health Systems, Inc., Customer Security Data Breach Litig.*, No. 15-00222-KOB (N.D. Ala.)
- *Greater Chautauqua Federal Credit Union, et al. v. Kmart Corporation, et al.*, No. 15-02228 (N.D. Ill)
- *Johnson et al. v. Cornerstone National Insurance Co.*, No. 22-cv-04135 (W.D. Mo.)
- *Holmes et al. v. Elephant Insurance Co. et al.*, No. 22-cv-00487 (E.D. Va.)

The firm has also served in leadership positions in other relevant cases throughout the United States:

- *In re Regents of the University of Minnesota Data Litigation*, No. 27-cv-23-14056 (Hennepin Cty. Dist. Ct.) (appointed member of Plaintiffs Executive Committee)
- *City of Hollywood Firefighters' Pension Fund v. Inspire Medical Systems, Inc.*, No. 23-cv-3884 (D. Minn.) (appointed Local Counsel)
- *In re: Apple Data Privacy Litigation*, No. 22-cv-07069 (N.D. Cal.) (member of Plaintiffs' Steering Committee)
- *In re FedLoan Student Loan Servicing Litigation*, No. 18-02833 (E.D. Pa.) (member of Plaintiffs' Executive Committee)
- *In re Target Corp. Customer Data Security Breach Litig.*, No. 14-md-02522-PAM (D. Minn.) (liaison counsel and member of Plaintiffs' leadership committee)

From the Courtroom to the Capitol®

- *In re Yahoo! Inc. Customer Data Security Breach Litig.*, No. 16-02752 (N.D. Cal.) (appointed member of Executive Committee)
- *Baker v. ParkMobile, LLC*, No. 21-cv-2182 (N.D. Ga.) (appointed member of Plaintiffs' Steering Committee)
- *In re Home Depot, Inc., Customer Data Security Breach Litig.*, No. 14-02583 (N.D. Ga.)
- *In re Netgain Technology, LLC, Consumer Data Breach Litigation*, No. 21-cv-01210 (D. Minn.) (appointed chair of Plaintiffs' Executive Committee)
- *In re GEICO Customer Data Breach Litigation*, No. 21-02210 (E.D.N.Y.) (appointed pre-approved member of leadership team)
- *Beck v. Austin*, No. 19-cv-01453 (D. Minn.) (appointed settlement class counsel)
- *In re EpiPen ERISA Litig.*, No. 17-cv-1884 (D. Minn.) (appointed liaison counsel)
- *Zimmerman v. Riverplace Counseling Center, Inc.*, No. 02-cv-19-6522 (Anoka Cty. Dist. Ct.) (appointed settlement class counsel)
- *Bellwether Community Credit Union v. Chipotle Mexican Grill, Inc.*, 17-01102 (D. Co.) (member of Financial Institution Plaintiffs' Executive Committee)
- *Veridian Credit Union v. Eddie Bauer LLC*, No. 17-00356 (W.D. Wash.) (member of Financial Institution Plaintiffs Executive Committee)
- *In re Facebook, Inc. Customer Privacy User Profile Litig.*, No. 18-02843 (N.D. Cal.)
- *In re Premera Blue Cross Customer Data Security Breach Litig.*, No. 15-2633 (D. Or.)
- *First Choice Federal Credit Union et al. v. The Wendy's Company et al.*, No. 16-00506 (W.D. Pa.) (member of Financial Institution Plaintiffs' Executive Committee)
- *In re Equifax, Inc. Customer Data Security Breach Litig.*, No. 17-02800 (N.D. Ga.) (member of Financial Institution Plaintiffs' Executive Committee)
- *In re iPhone Application Litig.*, Civil No. 10-CV-05878-LHK (N.D. Cal.)
- *In re Warner Music Group Data Breach*, No. 20-cv-07473 (S.D.N.Y.)
- *In re Wawa, Inc. Data Security Litig.*, No. 19-6019 (E.D. Pa.)

In other District Courts, Lockridge Grindal Nauen served or serves as Lead or Co-Lead Counsel in the following cases, among others:

- *D&M Farms et al. v. Birdsong Corp. et al.*, No. 2:19-cv-0463-HCM-LRL (E.D. Va.)
- *In re Broiler Chicken Antitrust Litig.*, No. 1:16-cv-08737 (N.D. Ill.)
- *In re Pork Antitrust Litig.*, No. 18-cv-01776-JRT-HB (D. Minn.)
- *Peterson v. BASF Corp.*, Civil No. C2-97-295 (Norman Cnty. Dist. Ct., Minn.)
- *In re Beef Purchasers Antitrust Litig.* (aka, *Peterson v. JBS USA Food Co. Holdings et al.*), No. 0:19-cv-01129 (D. Minn.)
- *Judith Thorkelson, et al. v. Publishing House of the Evangelical Lutheran Church in America, et al.*, Court File 10-01712 (D. Minn.)
- *In Re Baycol Products Litig.*, MDL No. 1431 (D. Minn.)
- *Benacquisto, et al. v. American Express Financial Corp. et al.*, Master File No. 00-1980 (D. Minn.), Civil Action No. 96-18477 (Henn. Cty. Dist. Ct.) (insurance class action)
- *In Re HardiePlank Fiber Cement Siding Litig.*, MDL No. 2359 (D. Minn.)
- *In Re Lutheran Brotherhood Variable Insurance Products Co. Sales Practices Litig.*, MDL No. 1309 (D. Minn.)
- *In Re Monosodium Glutamate Antitrust Litig.*, MDL No. 1328 (D. Minn.)
- *In Re Northstar Education Finance, Inc. Contract Litig.*, MDL 08-1990 (D. Minn.)
- *In Re Piper Funds, Inc. Institutional Government Income Portfolio Litig.*, Master File No. 3-94-587 (D. Minn.)
- *In re Turkey Antitrust Litig.*, No. 1:19-cv-08318 (N.D. Ill.)
- *In re Surescripts Antitrust Litig.*, No. 1:19-cv-06627 (N.D. Ill.)
- *Olean Wholesale Grocery Cooperative, et al. v. Agri Stats, Inc., et al.*, No. 1:19-cv-08318 (N.D. Ill.)

- *In re Freight Forwarders Antitrust Litigation (Precision Associates, Inc. v. Panalpina World Transport (Holding) Ltd., et al.)*, No. 1:08-cv-42-JG-VVP (E.D.N.Y.)
- *In Re Catfish Antitrust Litig.*, MDL No. 928 (N.D. Miss.)
- *In Re CertainTeed Corp. Roofing Shingle Products Liability Litig.*, MDL 1817 (E.D. Pa.)
- *George Guenther, et al. v. Cooper Life Sciences, et al. (Cooper Life Sciences Securities Litig.)*, No. C 89-1823 MHP (N.D. Cal.)
- *In Re IKO Roofing Shingle Products Liability Litig.*, MDL No. 2104 (C.D. Ill.)
- *In Re Kitec Plumbing Systems Products Liab. Litig.* MDL No. 2098 (N.D. Tex.)
- *Meyers v. The Guardian Life Insurance Company of America, Inc. Litig.*, Civil No. 2:97CV35-D-B (N.D. Miss.)
- *In Re Polypropylene Carpet Antitrust Litig.*, MDL No. 1075 (N.D. Ga.)
- *In Re: Potash Antitrust Litigation (II)*, MDL No. 1996 (N.D. Ill.)
- *In Re Residential Doors Antitrust Litig.*, MDL No. 1039 (E.D. Pa.)
- *Gary G. Smith, et al. v. Little Caesar Enterprises, Inc., et al. (Little Caesar Franchise Litig.)*, Civil No. 93 CV 74041 DT (E.D. Mich.)
- *In Re Unisys Savings Plan Litig.*, Master File No. 91-3067 (E.D. Pa.)

LGN also has or had substantial involvement in the following litigation:

- *Baysal v. Midvale Indemnity Company et al*, No. 21-cv-00394 (W.D. Wis.)
- *Park v. American Family Life Insurance Company et al.*, No. 22-cv-171 (W.D. Wis.)
- *Greenstate Credit Union v. Hy-Vee, Inc.* No. 20-cv-00621 (D. Minn.)
- *Greenstein et al. v. Noblr Reciprocal Exchange*, No. 21-04537 (N.D. Cal.)
- *Stallone v. Farmers Group, Inc. et al.*, No. 2:2021-cv-01659 (D. Nev.)
- *In re Generic Pharmaceuticals Pricing Antitrust Litig.*, Case No. 2:16-MD-02724 (E.D. Penn.)
- *In Re Air Cargo Shipping Services Antitrust Litig.*, Civil No. 1:06-md-1775-CBA-VVP (E.D.N.Y.)
- *Staley v. Gilead Sciences, Inc.*, No. 3:19-cv-02573-EMC (N.D. Ca.)
- *American Telephone and Telegraph Antitrust Litig.*, Civil Action No. 81-2623 (D.D.C.)
- *In Re AOL Time Warner Securities Litig.*, MDL No. 1500 (S.D.N.Y.)
- *In Re Blue Cross Blue Shield Subscriber Litig.*, Master File No. 19-C3-98-7780 (Dakota Cnty. Dist. Ct., Minn.)
- *In Re Connecticut General Life Insurance Co. Premium Litig.*, MDL No. 1336 (C.D. Cal.)
- *Davenport, et al. v. Illinois Farmers Insurance Company, et al.*, Case No. CIV-03-158-F (W.D. Ok.)
- *In Re Delphi Corporation Securities, ERISA, and Shareholder Derivative Litig.*, Master Case No. 05-md-1725 (E.D. Mich.)
- *In Re Domestic Air Transportation Antitrust Litig.*, MDL No. 861 (N.D. Ga.)
- *Eliason v. Gentek Building Products, Inc., et al.*, Civ. No. 10-cv-2093 (N.D. Ohio) (Executive Committee)
- *In Re Federal National Mortgage Association Securities, Derivative and ERISA Litig.*, MDL No. 1668 (D.D.C.)
- *In Re Flat Glass (I) Antitrust Litig.*, MDL No. 1200 (W.D. Pa.)
- *In Re Guidant Corp. Implantable Defibrillators Products Liability Litig.*, MDL No. 1708 (DWF/AJB)(D. Minn.)
- *Haritos, et al. v. American Express Financial Advisors, Inc.*, 02-2255-PHX-PGR (D. Ariz.)
- *In Re ICN/Viratek Securities Litig.*, 87 Civ. 4296 (S.D.N.Y.)
- *In Re Lease Oil Antitrust Litig.*, MDL No. 1166 (S.D. Tex.)
- *In Re Medtronic, Inc. Implantable Defibrillator Products Liability Litig.*, MDL No. 1726 (JMR/AJB) (D. Minn.)
- *In Re Medtronic, Inc. Sprint Fidelis Leads Products Liability Litig.*, MDL 08-1905 (D. Minn.) (Liaison Counsel)
- *In Re Merck & Co., Inc., Securities, Derivative & ERISA Litig.*, No. 3:05-cv-1151 (D.N.J.)
- *In Re Meridia Products Liability Litig.*, MDL No. 1481 (N. D. Ohio)
- *In Re Nasdaq Market-Maker Antitrust Litig.*, MDL No. 1023 (S.D.N.Y.)
- *In re Payment Card Interchange Fee and Merchant Discount Antitrust Litig.*, MDL No. 1720 (E.D.N.Y.)

- *Ohio Public Employees Retirement System, et al. v. Freddie Mac, et al.*, MDL No. 1584 (S.D.N.Y.)
- *In Re Propulsid Products Liability Litig.*, MDL No. 1355 (E.D. La.)
- *In Re Rezulin Litig.*, MDL No. 1348 (S.D.N.Y.)
- *In Re Vioxx Product Liability Litig.*, MDL No. 1657 (E.D. La.)
- *In Re Vytorin/Zetia Marketing, Sales Practices, and Products Liability Litig.*, MDL 1938 (D.N.J.)
- *In Re Worldcom, Inc. Securities Litig.*, No. 02-CV-3288 (S.D.N.Y.)

Cybersecurity Breach Presentations

- 2022 31st **Annual Health Benefits Conference + Expo**, presented by the **International Foundation of Employee Benefit Plans** (February 2, 2022), Kate Baxter-Kauf and Karen H. Riebel presented on “Health Benefits and the Value of Robust Data Security Practices.”
- 2021 Sedona Conference **Working Group 11 Midyear Meeting** Dialogue Leader and Moderator, *Has the time come for a second edition of the WG11 Commentary on Application of Attorney-Client Privilege and Work-Product Protection to Documents and Communications Generated in the Cybersecurity Context?* (October 28, 2021), Kate Baxter-Kauf, speaker; *Notice and Consent – Biometric Facial Recognition Data* (October 29, 2021), Kate Baxter-Kauf, speaker.
- **Class Action Money & Ethics Conference**, Presented by Beard Group, Inc., *Drilling in the Data Oil Fields: What’s New and Trending in Data Privacy Class Actions* (June 30, 2021), Kate Baxter-Kauf, speaker.
- **Third Annual Western Alliance Bank Class Action Law Forum**, in collaboration with University of San Diego School of Law, *Privacy & Data Breach* (April 22, 2021), Kate Baxter-Kauf, speaker.
- 2021 Sedona Conference **Working Group 11 Annual Meeting** Dialogue Leader and Moderator, *Has the time come for a second edition of the WG11 Commentary on Application of Attorney-Client Privilege and Work-Product Protection to Documents and Communications Generated in the Cybersecurity Context?* (April 14, 2021), Kate Baxter-Kauf, speaker.
- 2020 Sedona Conference **Working Group 11 Midyear Meeting** Dialogue Leader, *Biometric Privacy Laws* (September 30, 2020), Kate Baxter-Kauf, speaker.
- Data Breach Class Actions, *Practical Perspectives*, HB Litigation Conferences (May 19, 2020), Kate Baxter-Kauf, speaker.
- 2019 Federal Bar Association’s **Rising Professionals Symposium**, *Now That We’ve Found Standing, What Are We Gonna Do With It? What’s on the Horizon for Data Breach Litigation*, FBA Rising Professionals Symposium, Las Vegas (February 1, 2019), Kate Baxter-Kauf, featured speaker.
- 2016 Cyber Security Summit, Interactive Table Top Exercise on Preparing for and Reacting to Data Breach incidents, **Cyber Security Summit** Minneapolis (October 11, 2016), Kate Baxter-Kauf, panelist.
- The Other Data Breach Cases: Medical Records Cases and Cases on Behalf of Banks and Others presented at **Harris Martin’s Data Breach Litigation Conference** (March 25, 2015), in San Diego, Karen Riebel, speaker.
- A.A.J. Education’s Plaintiff-Only Hot Topics and Trends in Litigation Seminar (May 27, 2015), in Minneapolis, Karen Riebel, panelist.